

PAUL L. REIN, ESQ. (#43053)
LAW OFFICES OF PAUL L. REIN
200 Lakeside Drive, Suite A
Oakland, California 94612
Telephone: (510) 832-5001

Attorneys for Plaintiff RICHARD STICKNEY

KENNETH D. SIMONCINI, P.C. (#145586)
KERRI A. JOHNSON, ESQ. (#138344)
SIMONCINI & ASSOCIATES
Attorneys At Law
1694 The Alameda
San Jose, California 95126-2219
Telephone: (408) 280-7711
Facsimile: (408) 280-1330

Attorneys for Defendants CALIFORNIA GRAND CASINO, INC.
and LAMAR V. WILKINSON

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RICHARD STICKNEY,

Plaintiff,

v.

CALIFORNIA GRAND CASINO, INC.;
LAMARD V. "WILL" WILKINSON; and
DOES 1 - 25, Inclusive,

Defendants.

Case No.: C04-3552 CW

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME FOR
COMPLIANCE WITH INJUNCTIVE
RELIEF**

STIPULATION

Plaintiff RICHARD STICKNEY and defendants CALIFORNIA GRAND CASINO, INC. and
LAMAR V. WILKINSON hereby jointly stipulate and request that the Court extend defendant's

**STIPULATION AND ~~PROPOSED~~ ORDER TO EXTEND TIME FOR COMPLIANCE WITH INJUNCTIVE
RELIEF**

Case No. C04-3552 CW

1 deadline for complying with certain provisions of the Consent Decree and Order for a total of 45 days.

2 Good cause exists for continuing the motion deadline for the following reasons:

3 1. On September 7, 2005, the parties participated in a settlement conference before
4 Magistrate Judge Maria-Elena James. With Judge James' assistance, the parties settled the injunctive
5 relief and damage aspects of this litigation. As part of the injunctive relief portion of the settlement,
6 defendants agreed to submit plans for the remedial work within sixty (60) days of the signing of the
7 consent decree.

8 2. On or about November 3, 2005, counsel for defendants advised counsel for plaintiff that a
9 short extension of the deadline for submission of the plans was required. The short extension is required
10 in that defendants, who had been working with an architect during the course of this litigation, made the
11 decision to retain a new architect in order to complete the work agreed to as part of the consent decree.
12 The new architect needs a short extension in order to familiarize himself with the issues and prepare
13 plans to submit to the County for approval.

14 3. Defendants have satisfied the monetary payment provisions of the settlement in a timely
15 fashion.

16 4. The parties therefore jointly stipulate and request this court issue an order extending the
17 time for submission of plans for corrective work, as stated in paragraph 6(b) of the Consent Decree an
18 additional 45 days, or to December 27, 2005. The remaining provision regarding Timing of Injunctive
19 Relief shall remain unchanged.

20 Dated: November __, 2005

LAW OFFICES OF PAUL L. REIN

21 By: _____

22 PAUL L. REIN
23 Attorneys for Plaintiff
24 RICHARD STICKNEY

25 DATED: November __, 2005

SIMONCINI & ASSOCIATES

26 By: _____

KERRI A. JOHNSON

27 **STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR COMPLIANCE WITH INJUNCTIVE**
28 **RELIEF**

Attorneys for Defendants
CALIFORNIA GRAND CASINO, INC.
and LAMAR V. WILKINSON

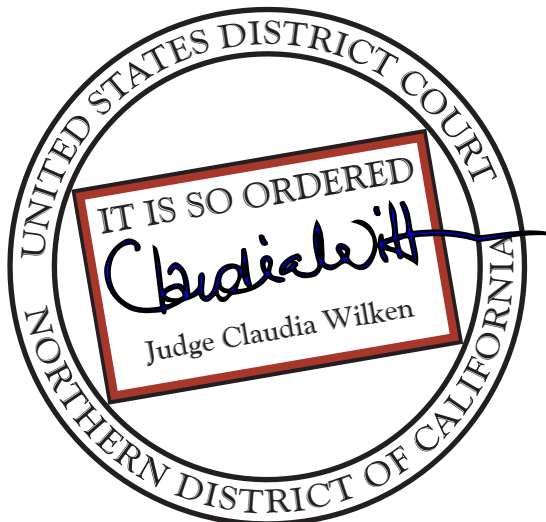
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ORDER

Pursuant to the stipulation of the parties and for good cause shown, IT IS SO ORDERED.

Dated: November 28, 2005

Honorable Claudia Wilken
United States District Court Judge



PROOF OF SERVICE

I, Rosanna Hernandez, certify and declare as follows:

I am over the age of 18 years, and not a party to the within action. My business address is 1694 The Alameda, San Jose, California 95126, which is located in the county where the mailing described below took place. On the date listed below, I served the following:

STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR COMPLIANCE WITH INJUNCTIVE RELIEF

by placing a true copy thereof enclosed in a sealed envelope and served in the manner and/or manners described below to each of the parties herein and addressed as stated below:

Paul L. Rein
Julie McLean
Law Offices of Paul L. Rein
200 Lakeside Drive, Suite A
Oakland, CA 94612
Tel: (510) 832-5001
Fax: (916) 686-5397

(Attorney for Plaintiff)

☐ United States Postal Service, U.S. Mail, with First Class postage prepaid and deposited in sealed envelope at San Jose, California. I am readily familiar with the business practice at my place of business for collection and processing of correspondence for mailing with the United States Postal Service. Correspondence so collected and processed is deposited with the United States Postal Service that same day in the ordinary course of business.

☐ Facsimile Transmission

☐ Hand-Delivery by Courier:

☒ Other: E-File

1 I certify and declare under penalty of perjury under the laws of the State of California that
the foregoing is true and correct.

2 Executed on November 23, 2005

ROSANNA HERNANDEZ

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